

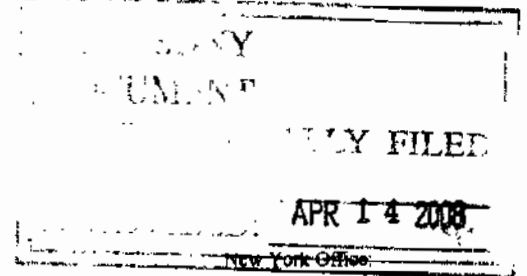
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Reply to: NJ

April 11, 2008

SO ORDERED

Via Fax (212) 805-6737

Honorable George B. Daniels
United States District Judge
United States District Court
Southern District of New York
U.S. Courthouse, Room 630
500 Pearl Street
New York, New York 10007-1312

George B. Daniels
HON. GEORGE B. DANIELS

APR 14 2008

Re: **Barbara Russell v. Heartland Express, Inc., et al.**
S.D.N.Y., Case No. 1:07 CV 9878 (GBD) (AJP)
Our File : HLE.1858

Dear Judge Daniels:

Please allow this correspondence to serve as defendants' request, on consent, to extend the discovery end date in this matter from May 8, 2008, by sixty days, to July 8, 2008 to allow the parties to complete discovery in this matter.

Discovery in this matter has been delayed because of ongoing settlement negotiations, which began shortly after the initial scheduling conference of February 7, 2008. Once it was apparent that a settlement could not be reached at this time, discovery continued. Despite the efforts of both parties, the plaintiff's medical providers have been slow in forwarding plaintiff's complete medical records. Thus, we have not been able to hold an independent medical examination or conduct plaintiff's deposition. Plaintiff's deposition had been scheduled for February 13, 2008, adjourned to March 10, 2008, and adjourned to April 14, 2008. It is now scheduled for May 14, 2008. While we have some of plaintiff's medical records, plaintiff's chief treating physician, Dr. Enrique Davis of Bridge Chiropractic, still owes us his records. They say those records are voluminous and are finally being sent out today. We requested them much earlier.

Hon. George B. Daniels
April 11, 2008
Page 2

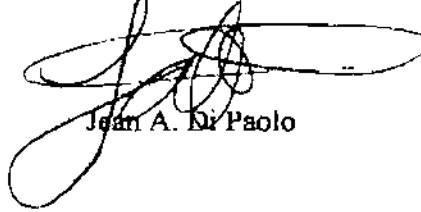
Law Offices

John C. Lane

We will continue in our diligent efforts to complete discovery in a timely manner, but respectfully request a sixty day extension to complete same.

Thank you for your courtesy.

Respectfully,

A handwritten signature in black ink, appearing to read "Jean A. Di Paolo", written over a horizontal line.

Jean A. Di Paolo

JAD:kal

cc: Michael Ridge, Esq. (*Via fax 718-681-0285*)